

Safety Attribute Inspection (SAI) Data Collection Tool

3.1.8 Carriage of Cargo (OP)

ELEMENT SUMMARY INFORMATION

Purpose of this Element (certificate holder's responsibility):

- To ensure that cargo handling and carrying operations are conducted safely.

Objective (FAA oversight):

- To determine if the certificate holder's Carriage of Cargo process meets all applicable requirements of Title 14 of the Code of the Federal Regulations (14 CFR) and FAA policies.
- To determine if the certificate holder's Carriage of Cargo process incorporates the safety attributes.
- To identify any shortfalls in the certificate holder's Carriage of Cargo process.

Specific Instructions:

- Intentionally left blank

SUPPLEMENTAL INFORMATION

Specific Regulatory Requirements (SRRs):

- SRRs:
 - 121.135(a)(1)
 - 121.135(b)(1)
 - 121.135(b)(2)
 - 121.135(b)(3)
 - 121.198
 - 121.285(b)(5)
 - 121.285(b)(8)
 - 121.285(c)
 - 121.285(c)(1)
 - 121.285(c)(2)
 - 121.285(c)(4)
 - 121.285(c)(5)
 - 121.287
 - 121.309(c)(2)

Related CFRs & FAA Policy/Guidance:

- Related CFRs:
 - Intentionally left blank
- FAA Policy/Guidance:
 - Intentionally left blank

SAI SECTION 1 - PROCEDURES ATTRIBUTE

Objective: Procedures, instructions, and information contained in the certificate holder's manual are documented methods for accomplishing a process. Policies contained in the certificate holder's manual should establish the certificate holder's compliance posture. Policies may not be stand-alone statements but may be imbedded within procedures, instructions, or information regarding a particular regulatory requirement. The questions in this section of the data collection tool (DCT) are designed to assist the inspector in determining if the certificate holder's manual has documented or prescribed methods of accomplishing the process requirements that provide answers to the associated questions regarding who, what, when, where, and how. This section contains policy questions, procedural questions, and instructional or informational questions pertaining to various types of certificate holder requirements such as actions, prohibitions, or resources (i.e., personnel, facilities, equipment, technical data, etc.).

Tasks

	To meet this objective, the inspector must accomplish the following tasks:
1.	Review the information listed in the Supplemental Information section of this DCT.
2.	Review the duties and responsibilities for management and other personnel identified by the certificate holder who accomplish the Carriage of Cargo process.
3.	Review the certificate holder's manual to ensure that it contains policies, procedures, instructions, and information necessary for the Carriage of Cargo process.

Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Does the content of the certificate holder's manual meet the specific regulatory and FAA policy requirements for a Carriage of Cargo process:	
1.1.	When operating any of the airplanes identified in 14 CFR part 121, section 198, does the certificate holder's manual specify that those airplanes may be operated (for cargo service only) at increased zero fuel and landing weights, subject to the requirements of sections 121.198(b)-(g)? SRRs: 121.198	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.2.	Does the certificate holder's manual specify that when carrying cargo in a bin in the passenger compartment:	
1.2.1	The bin may not be installed in a position that restricts access to or use of any required emergency exit, or of the aisle in the passenger compartment? SRRs: 121.285(b)(5)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.2.2	The bin is not installed in a position that obscures any passenger's view of the seatbelt sign, no smoking sign, or any required exit sign, unless an auxiliary sign or other approved means for proper notification of the passengers is provided? SRRs: 121.285(b)(8)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.3.	For operations where cargo is carried aft of a bulkhead or divider in any passenger compartment, does the certificate holder's manual specify that cargo must be restrained to specified load factors? SRRs: 121.285(c)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.4.	For operations where cargo is carried aft of a bulkhead or divider in any passenger compartment, does the certificate holder's manual specify that the cargo must be loaded as follows: SRRs: 121.285(c)	

1.4.1	<p>It is properly secured by a safety belt or other tiedown having enough strength to eliminate the possibility of shifting under all normally anticipated flight and ground conditions?</p> <p>SRRs: 121.285(c)(1)</p> <p><i>Related Design JTIs:</i></p> <ol style="list-style-type: none"> 1. Check that the Certificate Holder's manual system contains instructions and information to personnel that when cargo, is carried aft of a bulkhead or divider in any passenger compartment, ensure it is properly secured by a safety belt or other tiedown having enough strength to eliminate the possibility of shifting under all normally anticipated flight and ground conditions. <p>Sources: 121.135(a)(1); 121.285(c)(1)</p> <p>Interfaces: 1.1.1(AW); 1.1.2(AW); 1.1.2(OP); 1.3.1(AW); 1.3.2(AW)</p> <ol style="list-style-type: none"> 2. Check that the Certificate Holder's manual system contains instructions and information to personnel for cargo, carried aft of a bulkhead or divider in any passenger compartment, ensure it is restrained to the load factors in Sec. 25.561(b)(3). The Certificate Holder is responsible for providing acceptable data to ensure safety belt or tiedown devices will meet the load factors in Sec. 25.561(b)(3). <p>Sources: 121.135(a)(1); 121.285(c)(1)</p> <p>Interfaces: 1.1.1(AW); 1.1.2(AW); 1.1.2(OP); 1.3.1(AW); 1.3.2(AW)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.4.2	<p>It is packaged or covered in a manner to avoid possible injury to passengers and passenger compartment occupants?</p> <p>SRRs: 121.285(c)(2)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.4.3	<p>Its location does not restrict access to or use of any required emergency or regular exit, or of the aisle in the passenger compartment?</p> <p>SRRs: 121.285(c)(4)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.4.4	<p>It is positioned to not obscure any passenger's view of the seatbelt sign, no smoking sign, or required exit sign, unless an auxiliary sign or other approved means for proper notification of the passenger is provided?</p> <p>SRRs: 121.285(c)(5)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.5.	<p>Does the certificate holder's manual specify that when cargo is carried in cargo compartments that are designed to require the physical entry of a crewmember to extinguish any fire that may occur during flight, the cargo must be loaded so as to allow a crewmember to effectively reach all parts of the compartment with the contents of a hand fire extinguisher?</p> <p>SRRs: 121.287</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.6.	<p>If the certificate holder's aircraft has a Class E cargo compartment, does the manual specify that at least one hand fire extinguisher must be conveniently located for use in each such compartment and accessible to crewmembers during flight?</p> <p>SRRs: 121.309(c)(2)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
2.	<p>Does the certificate holder's manual contain general policies for the Carriage of Cargo process that comply with the SRRs?</p> <p>SRRs: 121.135(b)(1)</p> <p><i>Related Design JTIs:</i></p> <ol style="list-style-type: none"> 1. Check that the Certificate Holder's manual has a policy that no person may operate an aircraft under this part, part 121 of this chapter, in violation of an air carrier operating certificate, operating certificate, or 	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

	<p>appropriate operations specifications issued under this part. <i>Sources:</i> 119.5(l); 121.135(b)(1) <i>Interfaces:</i> 1.1.1(AW); 1.1.2(AW); 1.1.2(OP); 1.3.7(AW); 1.3.14(AW); 1.3.17(AW)</p> <p>2. Check that the Certificate Holder's manual has a policy that except as provided in paragraph (b), (c), or (d) or this section, the Certificate Holder may carry cargo in the passenger compartment of an airplane. <i>Sources:</i> 121.285(a)</p>	
3.	<p>Does the certificate holder's manual reference the appropriate Federal Aviation Regulations listed in the Supplemental Information section of this safety attribute inspection (SAI)? <i>SRRs:</i> 121.135(b)(3)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
4.	<p>Does the certificate holder's manual contain the duties and responsibilities for personnel who will accomplish the Carriage of Cargo process? <i>SRRs:</i> 121.135(b)(2)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.	<p>Does the certificate holder's manual include instructions and information for personnel to meet the requirements of the Carriage of Cargo process? <i>SRRs:</i> 121.135(a)(1)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

SAI SECTION 1 - PROCEDURES ATTRIBUTE Drop-Down Menu	
1.	No procedures, policy, instructions or information specified.
2.	Procedures or instructions and information do not identify (who, what, when, where, how).
3.	Procedures, policy or instructions and information do not comply with CFR.
4.	Procedures, policy or instructions and information do not comply with FAA policy and guidance.
5.	Procedures, policy or instructions and information do not comply with other documentation (e.g., manufacturer's data, Jeppesen's Charts, etc.).
6.	Procedures, policy or instructions and information unclear or incomplete.
7.	Documentation quality (e.g., unreadable or illegible).
8.	Procedures, policy or instructions and information inconsistent across Certificate Holder manuals (FOM - Flight Operations Manual to GMM - General Maintenance Manual, etc.).
9.	Procedures, policy or instructions and information inconsistent across media (e.g., paper, microfiche, electronic).
10.	Resource requirements incomplete (personnel, facilities, equipment, technical data).
11.	Other.

SAI SECTION 2 - CONTROLS ATTRIBUTE

Objective: Controls are checks and restraints designed into a process to ensure a desired result. The questions in this section of the DCT are designed to assist the inspector in determining if checks and restraints are designed into the process to ensure the desired result is achieved. Controls should be written into the manual system to ensure that the most important manual policies, procedures, or instructions and information will be followed.

Controls may be in the form of administrative controls, which are secondary or supplemental written procedures. Like written procedures, administrative controls also need to provide answers to questions regarding who, what, when, where, and how. Controls may also be in the form of engineered controls, such as automated features or mechanical actions or devices (i.e., safety devices, warning devices, etc.).

Tasks

To meet this objective, the inspector must accomplish the following tasks:

1. Review the control questions below.
2. Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the controls that it has documented.

Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Are the following controls built into the Carriage of Cargo process:	
1.1.	If cargo is carried in the passenger compartment, is there a control or controls in place to ensure that it is positioned in a way that does not restrict access to or use of any required emergency exit (or, if not in a bin, to any regular exit), or to the aisle in the passenger compartment, except as provided in 14 CFR part 121, section 285(d)?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.2.	If cargo is carried in the passenger compartment, is there a control or controls in place to ensure that it is positioned so that it does not obscure any passenger's view of the seatbelt sign, no smoking sign, or any required exit sign, unless an auxiliary sign or other approved means of notification is provided?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.3.	If cargo is carried aft of a bulkhead/divider in the passenger compartment, is there a control or controls in place to ensure that the cargo is restrained by a safety belt or other tiedown having enough strength to eliminate the possibility of shifting under normally anticipated flight and ground conditions?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.4.	If cargo is carried aft of a bulkhead/divider in the passenger compartment, is there a control or controls in place to ensure that the cargo is packaged or covered to avoid possible injury to passengers and passenger compartment occupants?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.5.	If the certificate holder's aircraft has a Class E cargo compartment, is there a control or controls in place to ensure that at least one hand fire extinguisher is conveniently located for use in each such compartment and accessible to crewmembers during flight?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.6.	If cargo is carried in cargo compartments that are designed to require the physical entry of a crewmember to extinguish any fire that may occur during flight, is there a control or controls in place to ensure that the cargo is loaded so as to allow a crewmember to effectively reach all parts of the compartment with the contents of a hand fire extinguisher?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
2.	Does the certificate holder have a documented method for assessing the impact	<input type="checkbox"/> Yes

	of any changes made to the controls in the Carriage of Cargo process?	<input type="checkbox"/> No, Explain
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SAI SECTION 2 - CONTROLS ATTRIBUTE Drop-Down Menu	
1.	No controls specified.
2.	Documentation for the controls do not identify (who, what, when, where, how).
3.	Controls incomplete.
4.	Controls could be circumvented.
5.	Controls could be unenforceable.
6.	Resource requirements incomplete (personnel, facilities, equipment, technical data).
7.	Other.

SAI SECTION 3 - PROCESS MEASUREMENT ATTRIBUTE

Objective: Process measurements are used by the certificate holder to measure and assess its processes, to identify and correct problems or potential problems, and to make improvements to the processes. The questions in this section of the DCT are designed to assist the inspector in determining if the certificate holder measures or assesses information to identify, analyze, and document potential problems with the process. Process measurements are a certificate holder's internal evaluation or auditing of the most important policies, procedures, or instructions and information associated with an element.

To prevent the duplication of work, process measurements are most commonly addressed through a combination of auditing features contained in both the certificate holder's safety program/internal evaluation program (for operations and cabin safety related issues) and the auditing function of the Continuous Analysis and Surveillance System (for airworthiness or maintenance/inspection related issues). The director of safety and the quality assurance department often work together to accomplish this function for the certificate holder. This approach requires amendment of the safety program/internal evaluation program audit forms or checklists and the Continuous Analysis and Surveillance System audit forms or checklists to include the specific process measurements for each element.

Tasks

	To meet this objective, the inspector must accomplish the following tasks:
1.	Review the process measurement questions below.
2.	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the process measurements that it has documented.

Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Does the certificate holder's Carriage of Cargo process include the following process measurements:	
1.1.	If cargo was carried in the passenger compartment, is there a process measurement or process measurements that would identify if it was positioned in a way that restricted access to or use of any required emergency exit (or, if not in a bin, to any regular exit), or to the aisle in the passenger compartment, except as provided in 14 CFR part 121, section 285(d)?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.2.	If cargo was carried in the passenger compartment, is there a process measurement or process measurements that would identify if it was positioned so that it obscured any passenger's view of the seatbelt sign, no smoking sign, or any required exit sign, unless an auxiliary sign or other approved means of notification was provided?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.3.	If cargo was carried aft of a bulkhead/divider in the passenger compartment, is there a process measurement or process measurements that would identify if the cargo was not restrained by a safety belt or other tiedown having enough strength to eliminate the possibility of shifting under normally anticipated flight and ground conditions?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.4.	If cargo was carried aft of a bulkhead/divider in the passenger compartment, is there a process measurement or process measurements that would identify if the cargo was not packaged or covered to avoid possible injury to passengers and passenger compartment occupants?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
1.5.	If the certificate holder's aircraft has a Class E cargo compartment, is there a process measurement or process measurements that would identify if at least	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

	one hand fire extinguisher was not conveniently located for use in each such compartment and accessible to crewmembers during flight?	<input type="checkbox"/> Not Applicable
1.6.	If cargo was carried in cargo compartments that are designed to require the physical entry of a crewmember to extinguish any fire that may occur during flight, is there a process measurement or process measurements that would identify if the cargo was not loaded so as to allow a crewmember to effectively reach all parts of the compartment with the contents of a hand fire extinguisher?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable
2.	Is there a process measurement or process measurements that would reveal if the certificate holder's policy, procedures, instructions, and information contained in its manual were not followed?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.	Does the certificate holder document its process measurement methods?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
4.	Does the certificate holder's manual provide for the use of process measurement results to improve its programs?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.	Does the organization that conducts the process measurements have direct access to the person with responsibility for the Carriage of Cargo process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

SAI SECTION 3 - PROCESS MEASUREMENT ATTRIBUTE Drop-Down Menu	
1.	No process measurements specified.
2.	Documentation for the process measurements does not identify (who, what, when, where, how).
3.	Inability to identify negative findings.
4.	No provisions for implementing corrective actions.
5.	Ineffective follow-up to determine effectiveness of corrective actions.
6.	Resources requirements (personnel, facilities, equipment, technical data).
7.	Other.

SAI SECTION 4 - INTERFACES ATTRIBUTE

Objective: Interfaces are used by the certificate holder to identify and manage the interactions between processes. The questions in this section of the DCT are designed to assist the inspector in determining whether or not interactions between the policies, procedures, or instructions and information associated with other independent processes within the certificate holder's organization are documented. Written policies, procedures, or instructions and information that are interrelated and located in different manuals within the certificate holder's manual system must be consistent and complement each other. For the interfaces to be effectively managed, it is not only important to identify what the interfaces are, but it is imperative to document the specific location of the interfaces within the certificate holder's manual system.

Tasks

	To meet this objective, the inspector must accomplish the following tasks:
1.	Review the interfaces associated with the Carriage of Cargo process that have been identified along with the individual questions in section 1, Procedures, of this DCT.
2.	Review the certificate holder's policies, procedures, instructions, and information to gain an understanding of the interfaces that it has documented.

Questions

	To meet this objective, the inspector must answer the following questions: NOTE: The design job task items (JTIs) displayed with the questions in section 1, Procedures, of this DCT identify potential interfaces (by element number) for this element.	
1.	Does the certificate holder's manual properly address the interfaces that are identified along with the individual questions in section 1, Procedures, of this DCT?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
2.	Does the certificate holder's manual document a method for assessing the impact of any changes to the associated interfaces within the Carriage of Cargo process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

SAI SECTION 4 - INTERFACES ATTRIBUTE Drop-Down Menu	
1.	No interfaces specified.
2.	The following interfaces not identified within the Certificate Holder's manual system:
3.	Interfaces listed are inaccurate.
4.	Specific location of interfaces not identified within the manual system.
5.	Other

SAI SECTION 5 - MANAGEMENT RESPONSIBILITY & AUTHORITY ATTRIBUTES

Objective: The questions in this section of the DCT address the responsibility and authority of the process. They are designed to assist the inspector in determining if there is a clearly identifiable, qualified, and knowledgeable person who is responsible for the process, is answerable for the quality of the process, and has the authority to establish and modify the process. (The person with the authority may or may not be the person with the responsibility.)

Tasks

	To meet this objective, the inspector must accomplish the following tasks:
1.	Identify the person who has overall responsibility for the Carriage of Cargo process.
2.	Identify the person who has overall authority for the Carriage of Cargo process.
3.	Review the duties and responsibilities of the person(s) documented in the certificate holder's manual.
4.	Review the appropriate organizational chart.

Questions

	To meet this objective, the inspector must answer the following questions:	
1.	Does the certificate holder's manual clearly identify who is responsible for the quality of the Carriage of Cargo process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain Name/Title:
2.	Does the certificate holder's manual clearly identify who has authority to establish and modify the policies, procedures, instructions, and information for the Carriage of Cargo process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain Name/Title:
3.	Does the certificate holder's manual include the duties and responsibilities of those who manage the work required by the Carriage of Cargo process? SRRs: 121.135(b)(2)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
4.	Does the certificate holder's manual include instructions and information for those who manage the work required by the Carriage of Cargo process? SRRs: 121.135(a)(1)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
5.	Does the certificate holder's manual clearly and completely document the responsibility for this position?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
6.	Does the certificate holder's manual clearly and completely document the authority for this position?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
7.	Does the certificate holder's manual clearly and completely document its qualification standards for the person having responsibility for the Carriage of Cargo process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
8.	Does the certificate holder's manual clearly and completely document its qualification standards for the person having authority to establish and modify the certificate holder's policies, procedures, instructions, and information for the Carriage of Cargo process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
9.	Does the certificate holder's manual clearly and completely document the procedures for delegation of authority for the Carriage of Cargo process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

SAI SECTION 5 - MANAGEMENT RESPONSIBILITY & AUTHORITY ATTRIBUTES Drop-Down Menu	
1.	Not documented.
2.	Documentation unclear.
3.	Documentation incomplete.
4.	Other.